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CAREER SYSTEMS DEVELOPMENT CORPORATION

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

DARLENE HOYT,

Plaintiff,

vs.

CAREER SYSTEMS DEVELOPMENT  
CORPORATION,

Defendant.

CASE NO.: 07 CV 1733 BEN (RBB)  
**DEFENDANT CAREER SYSTEMS  
DEVELOPMENT CORPORATION'S  
EX PARTE APPLICATION FOR AN  
ORDER DISQUALIFYING  
PLAINTIFF'S COUNSEL**

Judge: Hon. Roger T. Benitez  
Courtroom: 3

Defendant Career Systems Development Corporation ("CSDC") hereby applies to the Court *ex parte* for an Order disqualifying Plaintiff Darlene Hoyt's ("Plaintiff") counsel Paul Kondrick. CSDC's request to disqualify Mr. Kondrick from representing Plaintiff is based on his *ex parte* communication with a current CSDC employee who holds privileged information without notifying CSDC's counsel. Mr. Kondrick's conduct invaded the attorney-client privilege and violated the Rules of Professional Conduct. The only way to ensure that protected information is not used by Plaintiff is to disqualify Mr. Kondrick. Accordingly, CSDC

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1 respectfully requests that the Court grant its request to disqualify Mr. Kondrick from  
2 representing Plaintiff in this matter.

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4 Dated: April 26, 2010

ANDREWS · LAGASSE · BRANCH & BELL LLP  
By: /s/ Jonathan D. Andrews  
Jonathan D. Andrews  
Shauna L. Durrant  
Attorneys For Defendant  
CAREER SYSTEMS DEVELOPMENT  
CORPORATION

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